


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED JUL - 7 2020 By _____ Deputy 

UNITED STATES OF AMERICA

v.

Kristijan Krstic (1)

a.k.a. Kristian Jacobs

a.k.a. Felix Logan

a.k.a. Oliver Turner

a.k.a. Marshall Graham

Xenia Faye Atilano Krstic (2)

a.k.a. Majda Pratejc

a.k.a. Xenia Faye Jacobs

a.k.a. Xenia Faye Atilano



Marko Pavlovic (4)

a.k.a. Bjorn Emerson

a.k.a. Marlon Mattler

a.k.a. Willem Adelbert

Uros Selakovic (5)

a.k.a. Lax Lesmo

a.k.a. Micheal Anderson

a.k.a. Abbey Brooks



Haojia Miao (7)

a.k.a. Stan Miao



CRIMINAL NO. 3:20-CR-120-B

(Supersedes indictment returned on March
4, 2020)

FILED UNDER SEAL

Nenad Krstic (10)

a.k.a. Roland Valgerdur

a.k.a. Kevin Ericsson

Antonije Stojiljkovic (11)

a.k.a. Toni Rivas

a.k.a. Jacob Gold

Andrija Selakovic (12)

a.k.a. Andy Alinary

Blazo Radulovic (13)

Nikola Dimitrijevic (14)

Nenad Mladenovic (15)

Milos Mitic (16)

a.k.a. Tom Hardian

SUPERSEDING INDICTMENT

The Grand Jury charges:

At all times material to this Indictment:

Introduction

1. From in or about January 2014, the exact date being unknown to the Grand Jury, and continuing until in or about June 2020, in the Northern District of Texas and elsewhere, the defendants, **Kristijan Krstic, Xenia Faye Atilano Krstic,** [REDACTED], **Marko Pavlovic, Uros Selakovic,** [REDACTED], **Haojia Miao,** [REDACTED], **Nenad Krstic, Antonije Stojiljkovic, Andrija Selakovic, Milos Mitic, Blazo Radulovic, Nikola Dimitrijevic, Nenad Mladenovic,** and others, both known and unknown to the Grand Jury, helped create, promote, market, and organize fraudulent investment platforms, including Option Giants, Banking Option, Aeon Options, Options

Rider, Bancde Options, Instant Options, Fast Options, Elite Options, Start Options, Crypto Trading World, Dragon Mining, Trinity Mining, BTC Mining Factory, Bitcoin Trading World, BTC Trader Online, BTC Falcon, Perpetual Energy, Hedger Tech, Go Solar Mining, Perfect-Options, and others. (fraudulent investment platforms).

2. The defendants created, promoted, marketed, and organized the fraudulent investment platforms from China, Australia, the Philippines, and Serbia.

3. Using the internet and online websites as marketing tools, the defendants would target investors around the world, including in the Northern District of Texas, to invest in the fraudulent investment platforms for binary options and cryptocurrency mining.

4. Investors were given a username and password to view their investments online. Once logged on, investors were shown a positive return on their investments; however, no real trading was actually occurring, and their investment funds were spent on personal expenses and to pay commissions.

5. Fake names and pictures were created for the fraudulent investment platforms' officers and chairmen. The defendants would often use female names as aliases to directly communicate and promote the fraudulent investment platforms to investors around the world. Additionally, the defendants would conduct conference calls and video meetings during which they would represent themselves as different people in order to trick investors into believing the fraudulent investment platforms were legitimate.

6. In regards to binary options, the fraudulent investment platforms would claim they were the “world’s market leader in binary options,” the average payout was “80%,” and investors would gain a “20% refund on every lost trade,” when, in fact, the defendants knew no real trading ever occurred.

7. In regards to cryptocurrency mining, the fraudulent investment platforms would claim that they had plants in “UAE, India, Morocco, Mexico and China,” that an individual could “purchase bitcoin at half the market price!!!,” and that they have a “mining farm which guarantees 24/7 mining through our world-wide mining facilities,” when, in fact, the defendants knew these cryptocurrency mining facilities never existed, and that purchases of Bitcoin could not be had for fifty percent of the market price.

8. The overall conspiracy involving the fraudulent investment platforms resulted in a total loss of over seventy million dollars to investors around the world.

Count One

Conspiracy to Commit Wire Fraud
(Violation of 18 U.S.C. § 1349)

9. The Grand Jury realleges and incorporates by reference the allegations contained in paragraphs 1 through 8 of this indictment, as if fully set forth herein.

10. From at least in or about January 2014 through at least in or about June 2020, the exact dates being unknown to the Grand Jury, in the Northern District of Texas, and elsewhere, the defendants, **Kristijan Krstic (Krstic)**, **Xenia Faye Atilano Krstic (Xenia)**, [REDACTED], **Marko Pavlovic (Pavlovic)**, **Uros Selakovic (Selakovic)**, [REDACTED], **Haojia Miao (Miao)**, [REDACTED], [REDACTED], **Nenad Krstic (Nenad)**, **Antonije Stojiljkovic (Stojiljkovic)**, **Andrija Selakovic (Andrija)**, **Milos Mitic (Mitic)**, **Blazo Radulovic (Radulovic)**, **Nikola Dimitrijevic (Dimitrijevic)**, **Nenad Mladenovic (Mladenovic)**, and others, did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to commit certain offenses against the United States, to wit: wire fraud, in violation of 18 U.S.C. § 1343.

Object of the Conspiracy

11. It was the object of the conspiracy for potential investors to invest with fraudulent investment platforms such as Option Giants, Banking Option, Aeon Options, Options Rider, Bancde Options, Instant Options, Fast Options, Elite Options, Start Options, Crypto Trading World, Dragon Mining, Trinity Mining, BTC Mining Factory, Bitcoin Trading World, BTC Trader Online, BTC Falcon, Perpetual Energy, Hedger Tech, Go Solar Mining, Perfect-Options, and others. United States-based “affiliates”

were recruited to pitch the fraudulent investment platforms to potential investors in the Northern District of Texas, and elsewhere. An investor would be directed to wire his/her "investment" to an international bank account for the value of the potential investment. The investor would then receive a username and password to watch the investment grow. Unbeknownst to the investor, there was never any investment, and the money wired internationally was used for personal gain, and to pay commissions to continue to promote future fraudulent investment platforms. The investor would never receive his/her original investment back and would, in turn, be directed to a new fraudulent investment platform controlled by the defendants.

Manner and Means

12. In furtherance of the conspiracy and scheme and artifice to defraud, the defendants, and other persons known and unknown to the Grand Jury, committed the following:

13. Between January 2014, to approximately February 2017, **Krstic, Xenia**, [REDACTED], **Pavlovic, Selakovic, Miao**, [REDACTED], **Andrija, Dimitrijevic, Mladenovic**, and others, conducted fraudulent investment platforms named Option Giants, Banking Option, Aeon Options, Options Rider, Bancde Options, Instant Options, Fast Options, Elite Options. Between January 2017 to approximately June 2020, **Krstic, Xenia**, [REDACTED], **Pavlovic, Selakovic**, [REDACTED], [REDACTED], **Andrija, Dimitrijevic, Mladenovic**, [REDACTED], **Nenad, Stojiljkovic, Radulovic, Mitic**, and others, conducted fraudulent investment platforms named Start Options, Crypto Trading World, Dragon Mining,

Trinity Mining, BTC Mining Factory, Bitcoin Trading World, Hedger Tech, BTC Trader Online, BTC Falcon, Perpetual Energy, Go Solar Mining and Perfect-Options.

14. **Krstic** directed the creation of Option Giants, Banking Option, Aeon Options, Options Rider, Bancde Options, Instant Options, Fast Options, Elite Options, Start Options, Crypto Trading World, Dragon Mining, Trinity Mining, BTC Mining Factory, Bitcoin Trading World, BTC Trader Online, BTC Falcon, Perpetual Energy, Hedger Tech, Go Solar Mining, Perfect-Options, and others, and would direct when to close and start a new fraudulent investment platform.

15. **Xenia's** personal name and an alias associated to her were used to register the domain names for the fraudulent investment platforms.

16. **Krstic, Pavlovic, [REDACTED], Nenad, Stojiljkovic, Andrija,** and others, would create fraudulent material and writings to place on the fraudulent investment platforms.

17. **Radulovic, Dimitrijevic, Mladenovic,** and others, would create, host, and buildout the websites connected to the fraudulent investment platforms by creating fake trading activity, fake withdrawal history, fake wire receipts, fake email addresses, fake passports, and by registering the websites connected to the fraudulent investment platforms with fake names.

18. **Krstic, [REDACTED], Pavlovic, Selakovic, [REDACTED], Miao, [REDACTED], Nenad, Stojiljkovic, Andrija, Mitic,** and others, would communicate with investors under aliases through email and online messengers to direct investors to invest in the fraudulent investment platforms.

19. **Krstic**, [REDACTED], **Pavlovic, Selakovic**, [REDACTED], **Nenad, Stojiljkovic**, and others, would have conference calls with investors, during which they would misrepresent their names and titles in order to defraud those investors.

20. **Krstic**, [REDACTED], **Pavlovic, Selakovic**, [REDACTED], **Nenad, Stojiljkovic, Andrija, Mitic**, and others, would direct investors from the Northern District of Texas and elsewhere, to wire their “investments” to an international bank account associated with **Krstic** and **Xenia**.

21. **Krstic** and **Xenia** paid commissions to [REDACTED], **Pavlovic, Selakovic**, [REDACTED], **Miao**, [REDACTED], **Nenad, Stojiljkovic, Andrija, Mitic**, and others, for revenue generated from their downline affiliates and investors for the fraudulent investment platforms.

All in violation of 18 U.S.C. § 1349.

Count Two
Conspiracy to Commit Money Laundering
(Violation of 18 U.S.C. § 1956(h))

22. The Grand Jury realleges and incorporates by reference the allegations contained in paragraphs 1 through 21 of this indictment, as if fully set forth herein.

23. From at least in or about January 2014 through at least in or about June 2020, in the Northern District of Texas and elsewhere, the defendants, **Kristijan Krstic**, **Xenia Faye Atilano Krstic**, [REDACTED], **Marko Pavlovic**, **Uros Selakovic**, [REDACTED], **Haojia Miao**, [REDACTED], **Nenad Krstic**, **Antoniye Stojiljkovic**, **Andrija Selakovic**, **Milos Mitic**, and others, both known and unknown to the Grand Jury, did knowingly combine, conspire, confederate, and agree with each other, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956(a)(2)(A), to wit: transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds, to a place in the United States, that is, a place in the Northern District of Texas, and elsewhere, from and through a place outside of the United States, to wit: wire transfers from financial institutions, with the intent to promote the carrying on of a specified unlawful activity, that is, wire fraud in violation of Title 18, United States Code, Section 1343.

In violation of 18 U.S.C. § 1956(h).

Notice of Criminal Forfeiture

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1)).

24. The United States hereby gives notice to each of the defendants, **Kristijan Krstic, Xenia Faye Atilano Krstic, [REDACTED], Marko Pavlovic, Uros Selakovic, [REDACTED], Haojia Miao, [REDACTED], Nenad Krstic, Antonije Stojiljkovic, Andrija Selakovic, Milos Mitic, Blazo Radulovic, Nikola Dimitrijevic, and Nenad Mladenovic**, that, upon conviction for the offense charged in Count One, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the offense.

25. The United States further gives notice to each of the defendants, **Kristijan Krstic, Xenia Faye Atilano Krstic, [REDACTED], Marko Pavlovic, Uros Selakovic, [REDACTED], Haojia Miao, [REDACTED], Nenad Krstic, Antonije Stojiljkovic, Andrija Selakovic, and Milos Mitic**, that, upon conviction for the offense charged in Count Two, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in, or traceable to property involved in, the offense.

26. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the existence of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

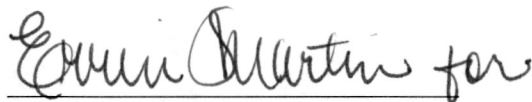
without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

A TRUE BILL


FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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Assistant United States Attorney
State Bar No. 24072791
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

V.

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a.k.a. Tom Hardian

SUPERSEDING INDICTMENT

18 U.S.C. § 1349
Conspiracy to Commit Wire Fraud
(Count 1)

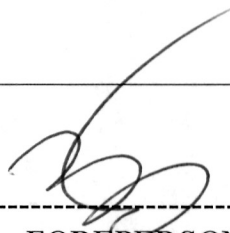
18 U.S.C. § 1956(h)
Conspiracy to Commit Money Laundering
(Count 2)

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1)
Forfeiture Notice

2 Counts

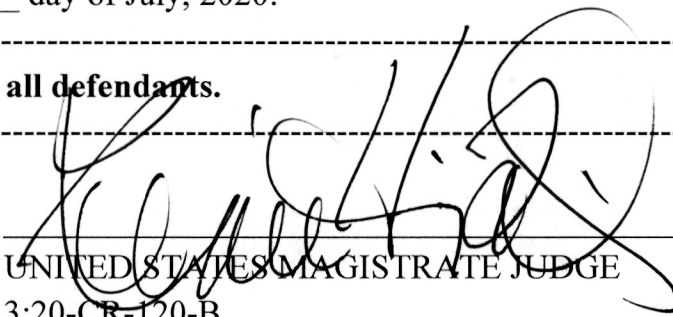
A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 7th day of July, 2020.

Warrants to be issued for all defendants.


UNITED STATES MAGISTRATE JUDGE
3:20-CR-120-B